



Department of  
Toxic Substances  
Control

700 Heinz Avenue  
Suite 200  
Berkeley, CA  
94710-2737

September 17, 1996

N00217.003366  
HUNTERS POINT  
SSIC NO. 5090.3



Pete Wilson  
Governor

James M. Strock  
Secretary for  
Environmental  
Protection

Engineering Field Activity, West  
Attn Mr. Richard Powell [1832]  
900 Commodore Drive  
San Bruno, California 94066-5006

Dear Mr. Powell:

**DRAFT CONSTRUCTION SUMMARY REPORT PICKLING AND PLATE  
YARD REMOVAL ACTION HUNTERS POINT ANNEX**

The Department of Toxic Substances Control (Department) has reviewed the above report. Information on hazardous waste determination, management and disposal is incomplete and confusing.

1. Section 4.2.5, please explain the reason(s) for elevated concentration at Station 2. In addition, please explain what measures were taken as a result of such elevated concentration. The purpose of air monitoring, stated in section 4.2, seems to have been ignored.
2. Section 4.4.1, the report does not explain how hydroblasting water, contaminated concrete, and contaminated racks were disposed. Please explain what are the "stockpiling activities".
3. Section 4.4.3, the report states that the debris was placed with "other concrete debris stockpile". However, the report does not explain how the building debris and "other concrete debris stockpile" were disposed.
4. Section 4.4.4, the report does not explain what happened to the "viscous liquid" inside the tank. What was salvaged?
5. Section 4.4.5, what happened to the tanks, tanks content, vault content, and brick lining? This section states that the content was liquid, where as in Section 3, it is stated to be sludge. Please explain?

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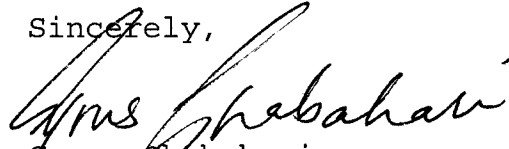
6. Section 4.4.5.2, what happened to the tank rinse water? Was hazardous waste determination done?
7. Section 4.4.6, please discuss the tank content and usage. Please explain how it was determined that the rinse water was not hazardous waste. How did you determine that the tank was suitable for salvage? What regulatory procedures did you follow for decontamination?
8. Section 4.4.7, this section is confusing because it is not clear why an area with debris was selected to store contaminated debris from a regulated removal action? What procedures were followed to determine what is and is not considered hazardous waste in the pile?
9. Section 4.5.2.1, the report states that extracts from concrete samples were only analyzed for few inorganics. This is not consistent with chemicals of concern in this area, since chromium IV was identified as a chemical of concern. The Navy seems to attribute the detection of chromium to "sample collection technique". This is highly anomalous where detected concentrations are set aside. To compound the matter further, the waste was apparently shipped as non-hazardous waste. However, the report states that the concrete blocks were disposed as hazardous waste. Please clarify and explain what happened to all concrete pieces. It is assumed that non-RCRA hazardous waste was shipped to a hazardous waste facility.
10. Section 4.5.2.2, what happened to the contaminated water from pressure washing the contaminated steel racks and other metal pieces? How was it determined that contaminated pieces with ZC could be sent to a facility for scrap?
11. Table 8, results of containment vault rinse water was not provided for our review. Please include.
12. Section 4.5.2.3, the Navy states that the several sample results were above the regulatory threshold. However, once results were averaged by the Navy, they indicate to be below the TCLP values. Please provide a regulatory citation that allows averaging the results. Please explain where the waste went.

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13. Section 4.5.2.5, bricks and sludge of tank containment vault were mixed. Some steel pieces were mixed with the hazardous waste, but were put back with other pieces for scrap. Please explain how the contaminated pieces were managed.
14. Section 4.5.2.5, the aboveground Acid Storage Tank was "hosed off and removed from the site by Alco to be used elsewhere by the Navy within HPA". This constitute recycling an AST. Please explain how it was determined that recycling a hazardous waste tank is permissible.
15. Section 4.5.2.7, please explain why vault liquid was shipped under "nonhazardous waste manifests" to an offsite facility. What is a nonhazardous waste manifest?
16. Section 4.5.3.2, please explain what happened to the rinse water. Was it characterized?
17. Section 4.6.1, it appears that rinse water to clean the vault was sent to a nonhazardous waste site as non-hazardous waste liquid. Please explain how, despite contaminated content, decon water was determined to be clean.

Should you have any questions regarding this letter, please call me at (510) 540-3821.

Sincerely,



Cyrus Shabahari  
Project Manager  
Office of Military facilities

cc: US EPA, Region IX  
Attn: Anna-Marie Cook [H-9-2]  
75 Hawthorne Street  
San Francisco, California 94105

Regional Water Quality Control Board  
Attn: Richard Hiett  
2101 Webster Street, Suite 500  
Oakland, California 94612